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May 30, 2019

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Updating the Commission's Rule for Over-the-Air Reception Devices (FCC WT Docket 19-71)

Dear Madam Secretary:

On May 29, 2019, the undersigned, as counsel for a coalition¹ that will be filing comments in the above-captioned docket, met with Will Adams, Legal Advisor to Commissioner Carr and Umair Javed, Legal Advisor to Commissioner Rosenworcel.

Our conversations focused on how the FCC's proposal went far beyond the original intent and delegation of authority to the Commission pursuant to Section 207 of the Telecommunications Act. We asked that Commissioners Carr and Rosenworcel honor the spirit and the letter of the Telecommunications Act.

This letter is filed in compliance with the obligations of Section 1.1206 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 1.1206.

Sincerely,

Gerard Lavery Lederer

for BEST BEST & KRIEGER LLP

cc: Will Adams (by email)
Umair Javed (by email)

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¹ The coalition at present includes the United States Conference of Mayors, The Texas Coalition of Cities for Utility Issues, the cities of Boston, MA; Dallas, TX; Los Angeles, CA; Fountain Valley, CA, Piedmont, CA, and Montgomery County Maryland. Others may join before the comments are filed.